

III. REMARKS

Claims 1-20 are pending in this application. By this amendment, claims 1, 2, 10, 12 and 17 have been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicant is not conceding in this application that those claims are not patentable over the art cited by the Office, as the present claim amendments and cancellations are only for facilitating expeditious prosecution. Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicant respectfully requests entry of this Amendment.

In the Office Action, claims 1, 10, 12 and 17 are objected to for alleged informalities. Claims 12-16 are rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. Claims 12, 14, 16-17 and 19 are rejected under 35 U.S.C. §102(a) as allegedly being anticipated by Ohsugi *et al.*, ‘A Recommendation System for Software Function Discovery’ APSEC 2002, pages 248-257, hereafter “Ohsugi.” Claims 1-11, 13, 15, 18 and 20 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Ohsugi in view of Arcuri *et al.* (U.S. Patent No. 6,121,968), hereafter “Arcuri.”

A. OBJECTION TO CLAIMS 1, 10, 12 AND 17 FOR INFORMALITIES

The Office has objected to claims 1, 10, 12 and 17 for alleged informalities. Specifically, the Office objects to the use of the term “intereface” in the claims. Applicant has amended claims 1, 10, 12 and 17 to replace the term “intereface” with “interface”. Accordingly, Applicant respectfully requests withdrawal of the objection.

B. REJECTION OF CLAIMS 12-16 UNDER 35 U.S.C. §101

The Office has rejected claims 12-16 for allegedly being directed to non-statutory subject matter. Specifically, with regard to independent claim 12, the Office asserts that the claimed system would reasonably be interpreted by one of ordinary skill in the art as software, per se. Applicant has amended claim 12 to include a processor and a memory. Applicant respectfully submits that the claim, as amended, further comports with the Office’s interpretation of what is patentable under 35 U.S.C. §101. Accordingly, Applicant requests that the rejection be withdrawn.

C. REJECTION OF CLAIMS 12, 14, 16, 17 AND 19 UNDER 35 U.S.C. §102(e)

With regard to the 35 U.S.C. §102(a) rejection over Oshugi, Applicant asserts that Oshugi does not teach each and every feature of the claimed invention. For example, with respect to independent claims 12 and 17, Applicant submits that Oshugi fails to teach a definition system for defining a plurality of groups of users. Rather, the collaborative filtering procedure of Oshugi takes into account data from a single set of “all users.” To this extent, nowhere does Oshugi teach multiple groups of users. In contrast, the claimed invention includes “...definition system

for defining a plurality of groups of users.” Claim 12. As such, unlike the “all users” in the collaborative filtering procedure of Oshugi, the definition system of the claimed invention defines a plurality of groups of users. Thus, the collaborative filtering procedure of Oshugi does not teach the defining of the plurality of groups of users of the claimed invention. Accordingly, Applicant respectfully requests that the Office withdraw its rejection.

With respect to dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

D. REJECTION OF CLAIMS 1-11, 13, 15, 18 AND 20 UNDER 35 U.S.C. §103(a)

With regard to the 35 U.S.C. §103(a) rejection over Ohsugi in view of Arcuri, Applicant asserts that the combined references cited by the Office fail to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claims 1 and 10, as argued herein with respect to independent claims 12 and 17, Applicant respectfully submits that Oshugi fails to teach “...defining a plurality of groups of users.” Arcuri does not cure this deficiency, as it only pertains to a single user. Accordingly, Applicant respectfully requests that the rejection be withdrawn.

With respect to dependent claim 2, Applicant submits that the cited references fail to teach or suggest defining the group of users to include a plurality of users and to distinguish the group of users from an another group of users by including only users that use an application

having the user interface element for a given job function. The Office equates the limitation “job function” of the claimed invention with Oshugi’s names of clicked menu items or buttons (i.e., Function A-E) in Fig. 3. Page 250, left column; Fig. 3. However, this equating by the Office ignores both the difference between this element and other elements in the claimed invention and the definition of “job function” found in the specification. Initially, while the Function A-E labels refer to the names of clicked items or menus in Oshugi in the claimed invention, the job function is claimed distinctly from the user interface element. As such, the two terms of the claimed invention do not refer to the same feature.

Furthermore, as defined in the original specification, in the claimed invention, job function refers not to functions of the application itself, but to the particular function that a user of the application may have within a company (e.g., management, purchasing, or technical support). See e.g., para. 0028. To this extent, neither Ohsugi nor Arcuri teaches or suggests a group of users that use a particular application for a given job function. Still further, nowhere in either Ohsugi or Arcuri is it taught or suggested that a group of users is distinguished from another group of users by including only users that use the application for the particular job function. Accordingly, Applicant respectfully requests that the Office withdraw its rejection.


With regard to the Office's other arguments regarding dependent claims, Applicant herein incorporates the arguments presented above with respect to independent claims listed above. In addition, Applicant submits that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicant will forego addressing each of these rejections individually, but reserves the right to do so should it become necessary. Accordingly, Applicant respectfully requests that the Office withdraw its rejection.

IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,



/_____
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